

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS HOLDINGS INC. *et al.*,

Debtors.

Chapter 11

Case No. 08-13555 (SCC)

**NOTICE OF MOTION OF GROUP OF DEFENDANTS TO MODIFY  
CERTAIN ORDERS AFFECTING LITIGATION OF ADVERSARY PROCEEDING**

PLEASE TAKE NOTICE that a hearing on the annexed motion (the “Motion”) of the Group of Defendants (the “Defendants”) in the adversary proceeding titled *Lehman Bros. Special Financing Inc. v. Bank of America National Association et al.*, Adv. Pro. No. 10-03547 (the “Adversary Proceeding”), requesting modification of existing orders of the Bankruptcy Court staying litigation and establishing alternative dispute resolution procedures, to the extent such orders apply to the Adversary Proceeding, as more fully described in the Motion, will be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 621, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), on **May 14, 2014 at 10:00 a.m.** (**Prevailing Eastern Time**) (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s case filing

system and by all other parities in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 621; (ii) counsel to each of the Defendants, as listed in the signature blocks below; (iii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Richard W. Slack, Esq., Jacqueline Marcus, Esq., and Robert J. Lemons, Esq., attorneys for Lehman Brothers Holdings, Inc.; (iv) Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110, Attn: Paul R. DeFilippo, Esq., William F. Dahill, Esq., James N. Lawlor, Esq. and Adam M. Bialek, Esq., special counsel for Lehman Brothers Special Financing, Inc.; (v) Quinn Emanuel Urquhart & Sullivan, LLC, 865 S. Figueroa St., 10<sup>th</sup> Floor, Los Angeles, California 90017, Attn: Eric Winston, Esq., attorneys for the Official Committee of Unsecured Creditors appointed in these cases; and (vi) the Office of the United States Trustee for Region 2, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: William K. Harrington, Esq., Susan Golden, Esq. and Andrea Schwartz, Esq., so as to be filed and received by no later than **May 5, 2014 at 4:00 p.m. (Prevailing Eastern Time)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if objections to the Motion are not received by the Objection Deadline, the relief requested in the Motion shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: April 14, 2014  
 New York, New York

NOTEHOLDER DEFENDANTS

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